

September 24, 2018

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Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

Re: Application of SkyBest Communications, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange and Interexchange Telecommunications Services, and for Flexible Regulation of its Local Exchange Services and Alternative Regulation of its Interexchange Service Offerings Within the State of South Carolina

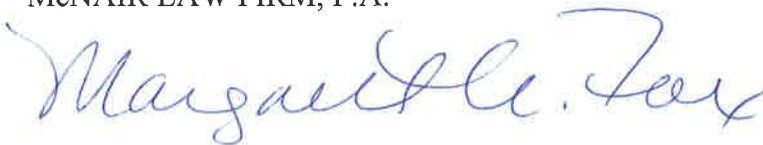
Dear Ms. Boyd:

Please find enclosed for filing on behalf of SkyBest Communications, Inc. ("SkyBest"), a Motion for Protective Treatment of Financial Statements as it relates to the Application for a Certificate of Public Convenience and Necessity to Provide Facilities-Based and Resold Local Exchange and Interexchange Telecommunications Services, and for Flexible Regulation of its Local Exchange Services and Alternative Regulation of its Interexchange Service Offerings Within the State of South Carolina filed by SkyBest.

Thank you for your assistance.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure: as stated

cc: Jeffrey M. Nelson, Esq.

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-__-C

IN RE:

Application of SkyBest Communications, Inc. for a)
 Certificate of Public Convenience and Necessity to Provide)
 Resold and Facilities-Based Local Exchange and)
 Interexchange Telecommunications Services, and for)
 Flexible Regulation of its Local Exchange Services and)
 Alternative Regulation of its Interexchange Service)
 Offerings Within the State of South Carolina)

**MOTION FOR PROTECTIVE TREATMENT AND BASIS FOR FILING EXHIBIT F
 TO APPLICATION AS A TRADE SECRET**

SkyBest Communications, Inc. (“SkyBest” or “Applicant”), by its attorneys and pursuant to S.C. Code Ann. § 39-8-10, *et seq.*, Commission Order No. 2005-226, and other applicable rules and regulations of the Public Service Commission of South Carolina (the “Commission”), respectfully requests that the Commission grant protective treatment of its financial statements, which are provided as Exhibit F to its Application for a Certificate of Public Convenience and Necessity in the above-captioned proceeding (“Application”). Because this Motion is an inseparable part of the Application, it is being filed concurrently with the Application. In support of this Motion, Applicant provides the following:

1. The name and address of the Applicant are as follows:

SkyBest Communications, Inc.
 1200 NC Hwy 194 North
 West Jefferson, NC 28694

2. All correspondence, notices, inquiries and other communications regarding this application should be sent to:

M. John Bowen, Jr.
 Margaret M. Fox
 McNair Law Firm, P.A.
 Post Office Box 11390
 Columbia, South Carolina 29211
 Telephone: (803) 799-9800
 Email: jbowen@mcnair.net; pfox@mcnair.net

I. Description of Confidential Information

3. By its Application, SkyBest seeks authority to provide resold and facilities-based local exchange and interexchange telecommunications services in the State of South Carolina. As evidence of its financial ability to provide the services for which it seeks certification, and as required by S.C. Code Ann. § 58-9-280(B)(1), SkyBest has attached to its Application as Exhibit F audited consolidated financial statements of SkyLine Telephone Membership Corporation (“SkyLine”), SkyBest’s parent company, for the year ended December 31, 2017. These documents contain highly confidential and strictly proprietary information, the public disclosure of which may result in direct, immediate and substantial harm to the competitive position of SkyBest and SkyLine in South Carolina and in other states where they do business.

II. Grounds for Claim of Confidentiality

4. The financial information submitted by Applicant in Exhibit F to its Application constitutes a “trade secret” as defined in the South Carolina Trade Secrets Act, S.C. Code Ann. § 39-8-10, *et seq.* The financial statements contain confidential and commercially-sensitive information. Applicant derives independent economic value from the fact that significant, detailed and proprietary information regarding its financial structure and current financing activities is unknown to its competitors. Public disclosure of this information would harm Applicant’s ability to compete in the provision of competitive telecommunications services in South Carolina, as well

as in other states where Applicant or its parent company provide such services. Additionally, the financial statements are not readily available to the public, and Applicant takes reasonable efforts under the circumstances to maintain their secrecy. When required to submit financial information to public authorities, all such information is clearly marked “confidential” and is accompanied by a request to maintain the confidentiality of the information and to withhold it from public disclosure.

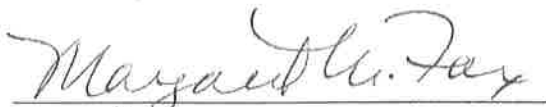
5. Applicant clarifies that its request for protection applies only to the financial statements attached as Exhibit F to the Application. Application is not seeking protection by means of this Motion for any other reports Applicant may be required to file with the Commission or the Office of Regulatory Staff (“ORS”) should the relief in the Application be granted.

III. Conclusion

6. The financial information included in support of the Application, for which confidential treatment is requested, is both proprietary and competitively sensitive. Applicant would suffer direct and substantial harm if such information were made publicly available. The harm that would result from public disclosure of Applicant’s proprietary financial information is real and not speculative.

WHEREFORE, SkyBest Communications, Inc. respectfully requests that the Commission grant this Motion for Protective Treatment of the financial statements provided as Exhibit F to its Application for a Certificate of Public Convenience and Necessity and filed under seal in this proceeding, and grant such other relief as is just and proper.

Respectfully submitted,

A handwritten signature in cursive script, reading "Margaret M. Fox", written in dark ink.

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

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Columbia, South Carolina 29211

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Attorneys for SkyBest Communications, Inc.

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